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RE: Transfer of Interest in Clairton Works Coke Oven Batteries: B, 13 and 14

This notice is provided to the named Plaintiffs in Civil Action Nos. 79-709 and 91-329 (U.S. District Court, Western District of Pa.), as required by Section XXIV Transfer of Interest of the Second Consent Decree, which was entered into by USX Corporation and the named Defendants on or about December 10, 1992.

This is to notify you that USX Corporation ("USX") will cause the formation of a Delaware limited partnership to be named "Clairton 1314B Partnership, L.P." or a similar name (the "Partnership"). USX will be the general partner of the Partnership and will contribute its interest in Coke Batteries 13, 14 and B at USX's Clairton Works to the Partnership. The Partnership expects to sell limited partnership interests to qualified investors. These transactions should be completed on or about March 28, 1997.

USX also intends to enter into a contractual agreement with the Partnership under which USX is engaged to operate Batteries 13, 14 and B.

This notice is provided for your information only and requires no action on your part.

USX Corporation

By: _____
C. Daniel Baker
Senior General Attorney
Environmental and Real Estate

CDB:rs

ANALYSIS OF CLAIRTON COM DATA

- Continuous opacity monitor (COM) readings from Batteries 13, 14, 15, B, and 20 at USS Clairton for a recent three-month period (January 99 through March 99) were used in the MACT options analysis for battery stacks. Subsequently, at COETF's request, COM data for these batteries were compared to historical data to assess their representativeness.

- The data were compared using the Allegheny County method: the number of hours per day that the opacity equaled or exceeded 20% for more than three minutes an hour. COM data for the 3-month period were compared to two historical periods, the 32-month period between January 1996 and September 1998 and the 56-month period between January 1994 and September 1998 (the entire period for which data are available).

- The results are presented in Table 1. The comparisons for the three 3-meter gun flue batteries (Batteries 13, 14, and 15) and the 6-meter gun flue battery (Battery B) indicate that the opacity, and thus performance, during the 3-month period is similar to that demonstrated during the historical periods. The comparison for the 4-meter underjet battery (Battery 20) indicates improved performance during the 3-month period. The average hours per day that opacity equals or exceeds 20% for more than three minutes is 1 hour for the 3-month period compared to 3 hours for the historical periods for Battery 20.

Table 1. Comparison of Recent Clairton COM Data With Historical Data

Battery	Average Hours Per Day Opacity ≥20% for 3+ min.		
	January through March 1999 (3 months)	January 1996 through September 1998 (32 months)	January 1994 through September 1998 (56 months)
13 *3-m gun flue*	0.33	0.25	0.33
14 *3-m gun flue*	0.20	0.24	0.55
15 *3-m gun flue*	0.74	0.51	0.65
B *6-m gun flue*	3.78	3.11	4.63
20 *4-m underjet*	1.12	3.15	3.00

ANALYSIS OF BURNS HARBOR COM DATA

Background

COM data were obtained for Batteries 1 and 2 at Bethlehem Steel, Burns Harbor, IN. Both batteries are 6-meters in height with underjet underfiring systems. Data for Battery 1 cover an 84-month period from 8/93 through 7/99. Data for Battery 2 cover a 56-month period from 12/94 (startup) through 7/99. All data are in the form of 6-minute averages.

Results -- Figures 1 and 2 present daily and 30-day rolling average opacities for Batteries 1 and 2, respectively over the aforementioned period. The daily and 30-day rolling average opacities at various percentiles are given in Tables 1 and 2.

Battery 1:

- Figure 1 illustrates a clear demarcation point in opacity levels occurring about July 1996. The daily average opacity levels recorded over the 36-month period prior to July 1996 average 8.1 percent with frequent wild oscillations. In contrast, opacity levels for the 36-month period after July 1996 average 4.8 percent with a substantial dampening in oscillation peaks.

- Reasons to explain the improvement in performance as evidenced by the data were examined. One apparent reason for improved performance is the resumption of end flue repairs. Battery 1 had 12 end flue repairs in 1992 and 20 in 1993. No end flue repairs were made in 1994 during the rebuilding of Battery 2. Repairs were then resumed in 1995 (12) and continued through 1996 (12), 1997 (14), and 1998 (8). Assuming there is a lag time for improvement in opacity resulting from end flue repairs, opacity levels for 1994 and at least part of 1995 are probably not representative of an optimally maintained battery.

Battery 2:

- Figure 2 shows that aside from the two and a half month period following startup in December 1994, Battery 2 has been consistently well controlled. The 30-day rolling average has been consistently below 10%, and almost all daily averages since February 1996 have been less than 10%.

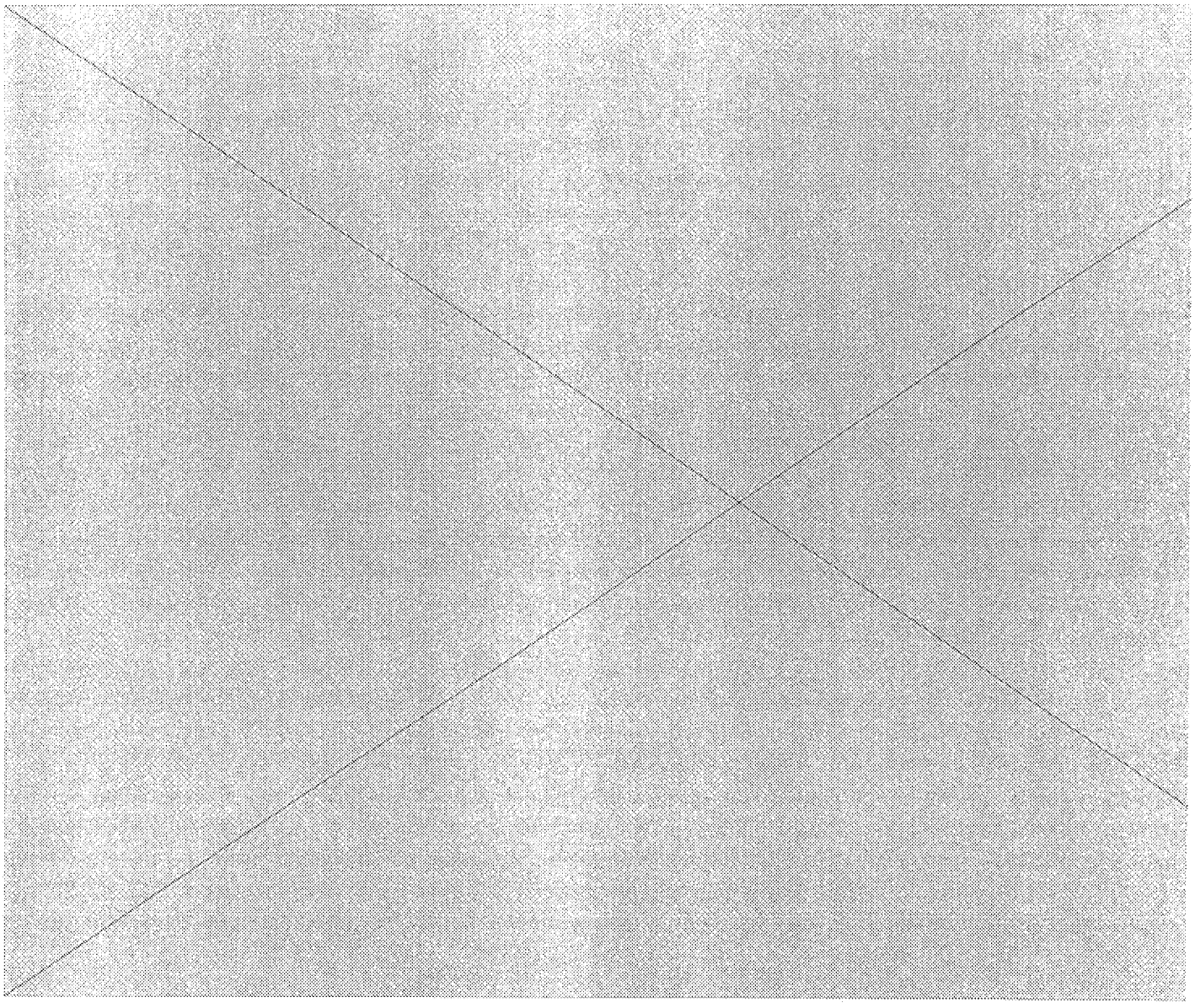

TABLE 1. DAILY AND 30-DAY ROLLING AVERAGES OF OPACITY BURNS HARBOR BATTERY 1

Time period	Percentile	Opacity (%)	
		Daily average	30-day rolling average
8/93 through 6/96	99.7	36	13
	99	28	12
	95	17	12
	90	14	11
	Average	8.1	
7/96 through 7/99	99.7	14	10
	99	12	9.4

	95	9.4	8.0
	90	7.7	6.6
	Average	4.8	
8/93 through 7/99	99.7	30	12
	99	25	12
	95	14	11
	90	11	10
	Average	6.4	

TABLE 2. DAILY AND 30-DAY ROLLING AVERAGES OF OPACITY BURNS HARBOR BATTERY 2

Time period	Percentile	Opacity (%)	
		Daily average	30-day rolling average
12/94 through 2/95 (startup after rebuild from the pad up)	99.7	64	31
	99	62	31
	95	57	30
	90	39	29
	Average	15	
3/95 through 7/99	99.7	13	8.1
	99	11	7.8
	95	7.9	6.8
	90	6.4	5.8
	Average	3.9	